

REID & ASSOCIATES

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June 1, 2022

BY ECF:

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Travelers Property Casualty Company of America v. Netherlands Insurance Company
Case Number: 21-cv-6061 (PAE)

Dear Judge Engelmayer:

This firm represents the plaintiff, Travelers Property Casualty Company of America ("Travelers"), in the above referenced matter. I write with the consent of defendant Netherlands Insurance Company ("Netherlands"), pursuant to Section 1.E of Your Honor's Individual Rules and Practices in Civil Cases, to request a brief extension of time for the parties to file joint stipulated facts in support of their anticipated motions for summary judgment. Pursuant to this Court's order of May 5, 2022, the joint stipulated facts are presently due on June 2, 2022, and the parties are requesting a one-week extension, until June 9, 2022. This is the first request for an extension. The parties are seeking this relief because there have been delays in preparing the joint stipulated facts, in large part because the undersigned counsel for Travelers was unexpectedly hospitalized for nearly a week due to an emergent health issue this month, which delayed provision of Travelers' draft to Netherlands.

Not a Partnership or Professional Corporation All attorneys are Employees of The Travelers Indemnity Company And its Property Casualty Affiliates

CONNECTICUT OFFICE: ONE TOWER SQUARE MS04A-0000 HARTFORD, CT 06183	NEW YORK OFFICE: 485 LEXINGTON AVENUE 7TH FLOOR NEW YORK, NY 10017	PENNSYLVANIA OFFICE: 10 SENTRY PARKWAY SUITE 300 BLUE BELL, PA 19422	CALIFORNIA OFFICE: 3333 MICHELSON DRIVE SUITE 1000 IRVINE, CA 92612
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The parties do not anticipate that this requested adjournment will impact the other summary judgment deadlines set by the Court in its in its May 5, 2022 Order.


Respectfully,

/s Amy C. Gross

Amy C. Gross

cc: Marshall T. Potashner (via ECF)

Granted. The Court wishes counsel a speedy recovery and good health. SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge
6/1/22

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